

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Rochester,

Debtor.

Case No. 19-20905

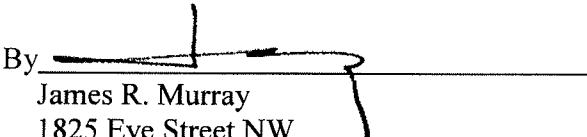
Chapter 11

NOTICE OF FILING

PLEASE TAKE NOTICE that, in accordance with the *Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [Docket No. 318], Blank Rome LLP has filed the *First Monthly Fee Statement of Blank Rome LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to The Diocese of Rochester for the Period September 12, 2019 Through November 30, 2019*, a copy of which is attached hereto and hereby served upon you.

Dated: December 11, 2019

BLANK ROME LLP

By 
James R. Murray
1825 Eye Street NW
Washington, DC 20006
Telephone: (202) 420-3409
Email: jmurray@blankrome.com

*Special Insurance Counsel
for The Diocese of Rochester*

3465862.1 12/10/2019

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Rochester,

Debtor.

Case No. 19-20905

Chapter 11

**FIRST MONTHLY FEE STATEMENT OF BLANK ROME LLP FOR
COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL
TO THE DIOCESE OF ROCHESTER FOR THE PERIOD
SEPTEMBER 12, 2019 THROUGH NOVEMBER 30, 2019**

Name of Applicant: Blank Rome LLP

Authorized to Provide Professional Services to: The Diocese of Rochester, Debtor-In-Possession

Date of Retention: Order entered November 27, 2019 [Docket No. 300]
Nunc Pro Tunc to September 12, 2019

Period for which compensation and reimbursement is sought: September 12, 2019 through November 30, 2019

Amount of compensation sought as actual, reasonable and necessary: 80% of \$106,602.26 (\$85,281.80)

Amount of expense reimbursement sought as actual, reasonable and necessary: \$3,604.17

This is a: X monthly quarterly final application.

This is Blank Rome LLP's first monthly fee statement in this case.

BLANKROME

1825 EYE STREET NW
WASHINGTON, DC 20006-5403
(202) 420-2200 FAX: (202) 420-2201
FEDERAL TAX ID NO. 23-1311874

ROMAN CATHOLIC DIOCESE OF ROCHESTER
ATTN: LISA M. PASSERO
CHIEF FINANCIAL OFFICER
1150 BUFFALO ROAD
ROCHESTER, NY 14624

INVOICE DATE: DECEMBER 06, 2019
MATTER NO. 156954-00601 03348
INVOICE NO. 1861501

REGARDING: ROMAN CATHOLIC DIOCESE OF ROCHESTER
INSURANCE ADVICE

FOR LEGAL SERVICES RENDERED THROUGH 11/30/19	\$ 138,444.50
LESS 23% ACCOMMODATION	<u>(31,842.24)</u>
NET SERVICES	<u>106,602.26</u>
FOR DISBURSEMENTS ADVANCED THROUGH 11/30/19	<u>3,604.17</u>
CURRENT INVOICE TOTAL	\$ 110,206.43

REMITTANCE

ACH / WIRE

BANK NAME: Citizens Bank
ADDRESS: Philadelphia, PA
ACCOUNT TITLE: Blank Rome LLP
ACCOUNT NUMBER: [REDACTED] 9326
ABA NUMBER: [REDACTED] 6150 (Domestic)
SWIFT CODE: CTZIUS33 (International)

MAIL

Blank Rome LLP
Attn: Finance Department
One Logan Square
130 North 18th Street
Philadelphia, PA 19103-6998

PENNSYLVANIA NEW YORK NEW JERSEY DELAWARE WASHINGTON, DC FLORIDA CALIFORNIA OHIO TEXAS ILLINOIS SHANGHAI

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INSURANCE ADVICE

FOR LEGAL SERVICES RENDERED THROUGH NOVEMBER 30, 2019

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
09/12/19	REVIEW INSURANCE SUMMARIES FOR COUNSEL AND FOLLOW UP QUESTIONS	J MURRAY	0.80	820.00
09/13/19	FOLLOW UP WITH S. DONATO AND TEAM REGARDING INSURANCE ISSUES AS RELATES TO CHAPTER 11	J MURRAY	0.90	922.50
09/16/19	REVIEW NOTICE ISSUES	J MURRAY	0.50	512.50
09/17/19	REVIEW AND ANALYZE CLAIM CORRESPONDENCE; UPDATE SPREADSHEET REGARDING SAME	J HOFFMAN	0.50	177.50
09/17/19	TELECONFERENCE WITH S. DONATO REGARDING INSURANCE STATUS	J MURRAY	0.50	512.50
09/19/19	REVIEW DRAFT RESPONSES TO CARRIERS	J MURRAY	0.80	820.00
09/20/19	REVIEW AND ANALYZE NOTICE LETTER REGARDING RYAN CLAIM; UPDATE SPREADSHEET REGARDING SAME	J HOFFMAN	0.40	142.00
09/20/19	CONFER WITH S. DONATO REGARDING INSURANCE AS RELATES TO COMMITTEE ISSUES	J MURRAY	0.70	717.50
09/23/19	REVIEW AND ANALYZE SECONDARY EVIDENCE OF POLICIES AND COORDINATE WITH J. HOFFMAN REGARDING ORGANIZING POLICY INFORMATION AND IDENTIFYING SECONDARY EVIDENCE (2.4); TELEPHONE CONFERENCE REGARDING INSURANCE COVERAGE ISSUES AND BANKRUPTCY (1.5); CONFERENCE WITH J. MURRAY REGARDING SAME (.2)	J CARTER	4.10	3,013.50

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
09/23/19	OFFICE CONFERENCE WITH J. CARTER REGARDING MARSH POLICY DOCUMENTS RECEIVED FROM G. MCDONALD; REVIEW AND ANALYZE INSURANCE POLICIES AND COVERAGE CHART	J HOFFMAN	3.00	1,065.00
09/23/19	TELECONFERENCE WITH S. DONATO AND C. SULLIVAN REGARDING INSURANCE ISSUES (1.4); REVIEW COVERAGE CHART AND CLAIM ANALYSIS TO DATE (1.0)	J MURRAY	2.40	2,460.00
09/24/19	CONFERENCE WITH J. HOFFMAN REGARDING POLICIES AND PREPARING POLICY CHART AND REVIEW AND ANALYZE POLICY	J CARTER	0.40	294.00
09/24/19	REVIEW AND ORGANIZE ELECTRONIC AND HARD COPIES OF INSURANCE POLICIES	J HOFFMAN	6.80	2,414.00
09/24/19	REVIEW STATUS OF CLAIMS AND CLAIMS MATRIX	J MURRAY	0.80	820.00
09/25/19	CONFERENCE WITH J. HOFFMAN REGARDING UPDATES TO POLICY CHART AND DISCUSS LMI POLICY LIMITS	J CARTER	0.20	147.00
09/25/19	REVIEW AND ORGANIZE COVERAGE ANALYSIS RECEIVED FROM MARSH; REVIEW AND ORGANIZE ELECTRONIC AND HARD COPIES OF INSURANCE POLICIES; OFFICE CONFERENCE WITH J. CARTER REGARDING SAME	J HOFFMAN	6.90	2,449.50
09/26/19	TELECONFERENCE WITH J. HOFFMAN REGARDING STATUS OF ORGANIZATION OF POLICIES AND POLICY CHART	J CARTER	0.10	73.50
09/26/19	REVIEW AND ORGANIZE ELECTRONIC AND HARD COPIES OF INSURANCE POLICIES; REVISE COVERAGE CHART	J HOFFMAN	5.30	1,881.50
09/27/19	CONSIDER MESSAGE REGARDING PROVIDING MATERIALS IN RESPONSE TO INSURER REQUESTS AND LEAVE MESSAGE; EMAIL TO J. MURRAY REGARDING SAME	J CARTER	0.40	294.00
09/30/19	REVISE POLICY CHART AND REVIEW POLICIES AND CONFERENCE WITH J. HOFFMAN REGARDING SAME (2.5); TELEPHONE CONFERENCE (.8)	J CARTER	3.30	2,425.50
09/30/19	REVIEW AND ORGANIZE COVERAGE CORRESPONDENCE; PREPARE ATTORNEY REVIEW BINDER REGARDING SAME; OFFICE CONFERENCE WITH J. CARTER REGARDING SAME	J HOFFMAN	1.90	674.50
09/30/19	TELECONFERENCE WITH S. DONATO REGARDING INSURANCE-RELATED ISSUES (0.4); REVIEW POSITION CORRESPONDENCE FROM CARRIERS (0.9)	J MURRAY	1.30	1,332.50

PENNSYLVANIA NEW YORK NEW JERSEY DELAWARE WASHINGTON, DC FLORIDA CALIFORNIA OHIO TEXAS ILLINOIS SHANGHAI

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/01/19	CONFERENCE WITH J. THOMAS REGARDING POLICY CHART PREPARATION	J CARTER	0.40	294.00
10/01/19	WORK ON MEETING WITH LMI INSURERS AND AGENDA FOR SAME	J MURRAY	0.80	820.00
10/01/19	PLAN AND PREPARE WITH J. CARTER REGARDING INSURANCE COVERAGE CHART POLICY REVIEW AND UPDATE	J THOMAS	0.50	195.00
10/02/19	REVIEW INSURANCE POLICIES TO UPDATE COVERAGE CHART	J THOMAS	2.30	897.00
10/03/19	REVIEW AND ANALYZE CNA'S LETTERS	J CARTER	0.20	147.00
10/03/19	REVIEW AND ORGANIZE DOCUMENTS RECEIVED FROM J. CARTER	J HOFFMAN	0.10	35.50
10/03/19	REVIEW POLICIES TO UPDATE COVERAGE CHART	J THOMAS	1.90	741.00
10/04/19	REVIEW POLICIES TO UPDATE COVERAGE CHART; REQUEST RESEARCH FROM THE LIBRARY REGARDING CENTENNIAL INSURANCE COMPANY	J THOMAS	2.10	819.00
10/05/19	REVIEW APPLICATION FOR EMPLOYMENT; TASK LIST	J CARTER	0.60	441.00
10/07/19	REVIEW AND REVISE APPLICATION FOR EMPLOYMENT AND FINALIZE SAME FOR SIGNATURE (1.5); CONFERENCE WITH J. THOMAS REGARDING POLICY CHART (1.1); REVIEW STATUS AND EMAIL J. MURRAY (.3); TELECONFERENCE WITH J. MURRAY AND S. DONATO (.5)	J CARTER	3.40	2,499.00
10/07/19	TELECONFERENCE WITH S. DONATO REGARDING STATUS OF INSURANCE ISSUES (0.8); REVIEW CLAIMS ANALYSIS TO DATE (0.9)	J MURRAY	1.70	1,742.50
10/07/19	FLAG ISSUES WITH INSURANCE POLICIES PRIOR TO CONFERENCE; CONFERENCE WITH J. CARTER REGARDING QUESTIONS ABOUT INSURANCE COVERAGE CHART; REVIEW MARSH MEMORANDUM	J THOMAS	3.20	1,248.00
10/08/19	REVIEW EMAILS AND FOLLOW UP ON INSURANCE STATUS	J MURRAY	0.70	717.50
10/08/19	UPDATE INSURANCE COVERAGE CHART	J THOMAS	1.20	468.00
10/09/19	REVIEW AND CONSIDER DRAFT LETTER TO CNA (1.5); REVIEW AND ANALYZE POLICIES (1.4)	J CARTER	2.90	2,131.50

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/09/19	REVIEW AND ANALYZE COVERAGE CORRESPONDENCE	J HOFFMAN	1.00	355.00
10/09/19	REVIEW CIC LETTERS REGARDING COVERAGE	J MURRAY	0.70	717.50
10/09/19	CONFERENCE WITH J. CARTER REGARDING REVIEW; REQUEST REVISIONS TO COVERAGE CHART; REVIEW REVISIONS; REVIEW POLICIES FOR COVERAGE CHART UPDATE; ANALYZE AND COMPARE DRAFT LETTER TO COVERAGE CHART	J THOMAS	4.00	1,560.00
10/09/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	1.60	432.00
10/10/19	REVISE POLICY CHART; REVIEW AND ANALYZE EXHIBITS; REVIEW/ANALYZE CNA LETTERS	J CARTER	2.60	1,911.00
10/10/19	REVIEW AND ANALYZE COVERAGE CORRESPONDENCE; UPDATE SPREADSHEET REGARDING SAME; OFFICE CONFERENCE WITH J. CARTER REGARDING SAME	J HOFFMAN	1.30	461.50
10/10/19	CONFERENCE WITH J. CARTER REGARDING INSURANCE COVERAGE CHART; UPDATE COVERAGE CHART; STRATEGIZE WITH S. NANG REGARDING UPDATE OF CHART	J THOMAS	3.40	1,326.00
10/10/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART; CONFER WITH J. THOMAS REGARDING CHANGES TO CHART	S NANG	2.60	702.00
10/11/19	REVIEW /ANALYZE LETTERS FROM INSURERS	J CARTER	0.70	514.50
10/11/19	PLAN AND PREPARE WITH J. CARTER REGARDING INSURANCE COVERAGE CHART; MAKE UPDATES TO INSURANCE COVERAGE CHART; REVIEW INSURANCE POLICIES FOR EXCLUSIONS	J THOMAS	3.50	1,365.00
10/11/19	REVIEW POLICIES AND DISCUSS THE SAME WITH J. THOMAS IN CONNECTION WITH COVERAGE CHART	R MICHAELSON	0.20	109.00
10/11/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	1.60	432.00
10/12/19	REVIEW/ANALYZE INSURANCE CORRESPONDENCE	J CARTER	2.10	1,543.50
10/12/19	CORRESPOND WITH J. CARTER AND S. NANG REGARDING INSURANCE COVERAGE CHART; REVIEW UPDATES TO COVERAGE CHART	J THOMAS	1.10	429.00

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10/12/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	2.20	594.00
10/13/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	0.80	216.00
10/14/19	RESPOND TO QUESTIONS REGARDING CONFLICTS; CONFERENCE WITH J. THOMAS REGARDING CHART; REVISE CHART	J CARTER	3.70	2,719.50
10/14/19	TELECONFERENCE WITH S. DONATO AND TEAM REGARDING STATUS AND STRATEGY (1.0); WORK ON COVERAGE ANALYSIS (1.2)	J MURRAY	2.20	2,255.00
10/14/19	UPDATE INSURANCE COVERAGE CHART; COORDINATE WITH J. CARTER AND S. NANG REGARDING REVISIONS	J THOMAS	2.60	1,014.00
10/14/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART; WORK WITH DOCUMENT SERVICES TO FORMAT DOCUMENT	S NANG	1.00	270.00
10/15/19	CONFERENCE WITH J. THOMAS; REVIEW CONFLICT REPORT FOR APPLICATION; TELECONFERENCE WITH C. SUGAYAN	J CARTER	1.20	882.00
10/15/19	REVIEW AND ANALYZE COVERAGE CORRESPONDENCE; UPDATE SPREADSHEET REGARDING SAME	J HOFFMAN	0.10	35.50
10/15/19	WORK ON INSURANCE ANALYSIS	J MURRAY	0.80	820.00
10/15/19	CONFERENCE WITH J. CARTER REGARDING COVERAGE CHART; REVIEW INSURANCE POLICIES AND REVISE COVERAGE CHART; COORDINATE WITH S. NANG REGARDING EDITS	J THOMAS	2.50	975.00
10/15/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	2.00	540.00
10/16/19	REVISE LETTER TO CNA; REVISE EMAIL RE LMI LIMITS; REVIEW CLIENTS FOR APPLICATION	J CARTER	4.30	3,160.50
10/16/19	REVIEW AND ANALYZE CONFLICT REPORT AND COMPARE TO SCHEDULE OF CREDITORS	J HOFFMAN	1.50	532.50
10/16/19	REVIEW CARRIER CORRESPONDENCE	J MURRAY	0.40	410.00
10/16/19	REVISE INSURANCE COVERAGE CHART; CONFERENCE WITH J. CARTER REGARDING CHART; REQUEST RESEARCH REGARDING INSURANCE COMPANY; REVIEW RESEARCH DONE BY LIBRARY REGARDING INSURANCE COMPANY STATUS	J THOMAS	2.20	858.00

PENNSYLVANIA NEW YORK NEW JERSEY DELAWARE WASHINGTON, DC FLORIDA CALIFORNIA OHIO TEXAS ILLINOIS SHANGHAI

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/16/19	CONFER WITH J. CARTER REGARDING ROCHESTER CHART FORMATTING; EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	2.20	594.00
10/17/19	REVISE COVERAGE CHART; CONFERENCE WITH J. THOMAS REGARDING SAME	J CARTER	0.50	367.50
10/17/19	CONFERENCE WITH J. CARTER; STRATEGIZE WITH S. NANG REGARDING UPDATES TO CHART; REVIEW POLICIES AND REVISE INSURANCE COVERAGE CHART	J THOMAS	2.10	819.00
10/17/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	1.40	378.00
10/18/19	REVIEW AND REVISE POLICY CHART	J CARTER	0.60	441.00
10/18/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	0.20	54.00
10/21/19	TELECONFERENCE WITH S. DONATO; PREPARE APPLICATION	J CARTER	1.70	1,249.50
10/21/19	REVIEW AND ANALYZE CORRESPONDENCE FROM CNA REGARDING CLAIMS; UPDATE SPREADSHEET REGARDING SAME	J HOFFMAN	0.50	177.50
10/21/19	REVIEW LMI INSURANCE ISSUES AND AGENDA, REVIEW LMI CORRESPONDENCE REGARDING CLAIMS	J MURRAY	2.20	2,255.00
10/22/19	COORDINATE WITH J. HOFFMAN REGARDING THE LMI LETTERS TO SEND TO J. MURRAY IN PREPARATION FOR MEETING; REVIEW POLICIES IN RESPONSE TO QUESTIONS REGARDING ANNUALIZATION	J CARTER	1.20	882.00
10/22/19	GATHER COPIES OF CORRESPONDENCE REQUESTED BY J. MURRAY; REVIEW AND ORGANIZE COVERAGE LETTERS RECEIVED FROM ALLIANZ	J HOFFMAN	3.60	1,278.00
10/22/19	MEETING WITH CLIENT AND TEAM REGARDING STATUS AND STRATEGY (2.0); MEETING WITH LMI COUNSEL REGARDING CLAIMS AND STATUS (2.0); CONFERENCES WITH S. DONATO REGARDING STATUS AND STRATEGY (1.0)	J MURRAY	5.00	5,125.00
10/23/19	EMAILS WITH CARRIERS REGARDING MEETING (0.4); REVIEW CARRIER CORRESPONDENCE ON CLAIMS (0.7)	J MURRAY	1.10	1,127.50
10/23/19	ANALYZE POLICIES FOR ENDORSEMENTS THAT EXTEND COVERAGE TO RELIGIOUS ORDERS	J THOMAS	1.60	624.00

ROMAN CATHOLIC DIOCESE OF ROCHESTER
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/24/19	REVIEW NEW CLAIMS LETTERS AND INSURANCE POSITIONS	J MURRAY	0.80	820.00
10/25/19	REVIEW RESERVATION OF RIGHTS LETTERS AND ANALYZE SAME	J MURRAY	1.00	1,025.00
10/26/19	TELECONFERENCE WITH S. DONATO AND C. SULLIVAN REGARDING STATUS AND INSURANCE	J MURRAY	0.70	717.50
10/29/19	FOLLOW UP WITH CNA COUNSEL REGARDING MEETING	J MURRAY	0.30	307.50
10/30/19	TELEPHONE CONFERENCE REGARDING STRATEGY IN RESPONSE TO CNA MOTION TO LIFT STAY	J CARTER	0.70	514.50
10/30/19	FOLLOW UP ON CNA REQUESTS AND ISSUES	J MURRAY	0.50	512.50
10/30/19	REVIEW DIOCESE OF DULUTH ADVERSARY PROCEEDING COMPLAINT FOR SAMPLE PRIOR TO DRAFTING	J THOMAS	0.50	195.00
10/30/19	REVIEW CNA'S MOTION SEEKING TO LIFT THE STAY; PARTICIPATE IN CALL WITH BANKRUPTCY AND DEFENSE COUNSEL REGARDING STRATEGIC NEXT STEPS	J ZOLA	1.50	1,222.50
10/31/19	REVIEW AND ANALYZE COVERAGE CORRESPONDENCE FROM AXIS; UPDATE SPREADSHEET REGARDING SAME	J HOFFMAN	0.30	106.50
10/31/19	TELECONFERENCE WITH TEAM REGARDING MOTION TO LIFT STAY (0.5); REVIEW MOTION TO LIFT STAY AND EMAILS REGARDING SAME (1.2)	J MURRAY	1.70	1,742.50
10/31/19	STRATEGIZE WITH J. CARTER REGARDING ADVERSARY PROCEEDING COMPLAINT	J THOMAS	0.20	NO CHARGE
11/03/19	DRAFT ADVERSARY PROCEEDING COMPLAINT	J THOMAS	2.10	819.00
11/04/19	UPDATE STATUS LIST	J CARTER	0.40	294.00
11/04/19	REVIEW COVERAGE CHART FOR FORWARDING TO COMMITTEE COUNSEL	J MURRAY	0.30	307.50
11/04/19	DRAFT ADVERSARY PROCEEDING COMPLAINT; REVIEW INSURANCE POLICIES FOR LLOYD'S SUBSCRIBERS AND RESEARCH CORPORATE STATUS OF SUBSCRIBERS FOR ADVERSARY PROCEEDING COMPLAINT	J THOMAS	4.60	1,794.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
11/05/19	TELECONFERENCE WITH C. SUGAYAN REGARDING LMI COVERAGE (0.6); TELECONFERENCE WITH S. DONATO REGARDING STATUS AND STRATEGY (0.6)	J MURRAY	1.20	1,230.00
11/06/19	REVIEW AND REVISE DRAFT COMPLAINT AND CONFERENCE WITH J. THOMAS REGARDING SAME	J CARTER	1.30	955.50
11/06/19	FOLLOW UP WITH COMMITTEE COUNSEL REGARDING INSURANCE ISSUES	J MURRAY	0.70	717.50
11/06/19	CONFERENCE WITH J. CARTER ABOUT DRAFT ADVERSARY PROCEEDING COMPLAINT; RESEARCH PARTIES FOR ADVERSARY PROCEEDING COMPLAINT; REVISE ADVERSARY PROCEEDING COMPLAINT	J THOMAS	3.40	1,326.00
11/07/19	REVISE COMPLAINT AND CONFERENCE WITH J. THOMAS REGARDING SAME; REVIEW POLICIES REGARDING INSURED STATUS OF PARISHES	J CARTER	5.10	3,748.50
11/07/19	REVIEW AND ANALYZE COVERAGE CORRESPONDENCE FROM CNA; UPDATE SPREADSHEET REGARDING SAME; OFFICE CONFERENCE WITH J. THOMAS REGARDING EDITS TO COVERAGE CHART	J HOFFMAN	0.60	213.00
11/07/19	TELECONFERENCE WITH S. DONATO REGARDING INSURANCE ISSUES (0.7); FOLLOW UP ON INSURANCE POLICY SEARCH AND COMMITTEE QUESTIONS (0.6)	J MURRAY	1.30	1,332.50
11/07/19	CONFERENCE WITH J. CARTER REGARDING REVISIONS TO ADVERSARY PROCEEDING COMPLAINT; REVISE ADVERSARY PROCEEDING COMPLAINT; REVIEW POLICIES AND UPDATE COVERAGE CHART	J THOMAS	2.20	858.00
11/08/19	REVIEW POLICIES IN CONNECTION WITH REVISING COMPLAINT	J CARTER	0.50	367.50
11/08/19	REVIEW AND ANALYZE COPIES OF ADDITIONAL POLICIES AND CORRESPONDENCE RECEIVED; UPDATE SPREADSHEET REGARDING SAME; OFFICE CONFERENCE WITH J. CARTER REGARDING SAME	J HOFFMAN	0.30	106.50
11/08/19	REVIEW CNA CORRESPONDENCE	J MURRAY	0.80	820.00
11/08/19	FINALIZE DRAFT OF INSURANCE ADVERSARY COMPLAINT (1.0); TELECONFERENCE WITH S. DONATO REGARDING INSURANCE ISSUES (0.5)	J MURRAY	1.50	1,537.50

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
11/08/19	REVISE DRAFT ADVERSARY PROCEEDING COMPLAINT; REVIEW POLICIES AND CREATE CHART OF ASSURED FOR EACH YEAR; UPDATE COVERAGE CHART	J THOMAS	4.40	1,716.00
11/08/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	0.80	216.00
11/11/19	TELECONFERENCE WITH S. DONATO AND TEAM REGARDING INSURANCE ADVERSARY PROCEEDING AND RELATED ISSUES (0.9); REVIEW AND EDIT ADVERSARY PROCEEDING DRAFT (0.7); REVIEW OPPOSITION DRAFT TO MOTION TO LIFT STAY (0.8)	J MURRAY	2.40	2,460.00
11/11/19	ANALYZE POLICIES AND REVISE CHART OF INSURED; REVIEW COMMENTS FROM R. MICHAELSON AND J. CARTER REGARDING CHART OF INSURED; REVIEW POLICIES TO CONFIRM INFORMATION IN OBJECTION TO CNA MOTION TO LIFT AUTOMATIC STAY	J THOMAS	3.20	1,248.00
11/11/19	REVIEW AND EDIT PROPOSED EDITS TO DOR OBJECTION TO CNA MOTION TO LIFT AUTOMATIC STAY	J ZOLA	0.70	570.50
11/11/19	REVIEW AND REVISE DRAFT POLICY CHART AND LIFT STAY MOTION OBJECTION	R MICHAELSON	2.40	1,308.00
11/12/19	REVIEW ADVERSARY PROCEEDING COMPLAINT AND ISSUES (1.0); TELECONFERENCE WITH TEAM REGARDING FILINGS AND STRATEGY (0.8)	J MURRAY	1.80	1,845.00
11/12/19	ANSWER FOLLOW-UP QUESTIONS ABOUT ROCHESTER ADVERSARY PROCEEDING COMPLAINT DRAFT; REVIEW AND REVISE ROCHESTER ADVERSARY PROCEEDING COMPLAINT WITH COMMENTS FROM CO-COUNSEL	J THOMAS	2.10	819.00
11/12/19	REVIEW AND CONFER WITH TEAM REGARDING PROPOSED EDITS TO ADVERSARY PROCEEDING COMPLAINT	J ZOLA	1.50	1,222.50
11/12/19	REVISE LIFT STAY MOTION OBJECTION; DISCUSSIONS WITH J. MURRAY AND J. THOMAS REGARDING DRAFT COMPLAINT	R MICHAELSON	1.30	708.50
11/12/19	EDIT DIOCESE OF ROCHESTER COVERAGE CHART	S NANG	0.20	54.00
11/13/19	FINAL REVIEW OF INSURANCE ADVERSARY COMPLAINT AND RELATED FILINGS	J MURRAY	2.00	2,050.00
11/13/19	FINALIZE DRAFT OF COMPLAINT	J THOMAS	0.30	117.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
11/13/19	REVIEW AND REVISE DRAFT COMPLAINT; CALLS WITH J. MURRAY REGARDING DRAFT PLEADINGS	R MICHAELSON	1.00	545.00
11/15/19	REVIEW AND ANALYZE ADVERSARY COMPLAINT, AND COVERAGE CORRESPONDENCE; UPDATE SPREADSHEET REGARDING SAME; OFFICE CONFERENCE WITH R. MICHAELSON REGARDING SAME	J HOFFMAN	0.30	106.50
11/15/19	REVIEW FOLLOW UP ISSUES FOR ADVERSARY PROCEEDING	J MURRAY	0.50	512.50
11/18/19	REVIEW AND REVISE PRO HAC VICE MOTION AND COORDINATE OBTAINING WAIVER FROM M&T BANK	J CARTER	1.30	955.50
11/18/19	REVIEW AND ANALYZE POLICY DOCUMENTS RECEIVED FROM J. CARTER; REVISE COVERAGE CHART REGARDING SAME	J HOFFMAN	0.90	319.50
11/18/19	CONFERENCE WITH C. SUGAYAN (LMI) REGARDING ADVERSARY PROCEEDING	J MURRAY	0.60	615.00
11/19/19	CONFER WITH R. MICHAELSON REGARDING CORRESPONDENCE	H AHN	0.20	109.00
11/19/19	TELECONFERENCE WITH S. DONATO REGARDING HEARING (0.3); CONFERENCE WITH C. SUGAYAN (LMI) REGARDING HEARING (0.4); CONFERENCE WITH COMMITTEE COUNSEL REGARDING HEARING (0.3)	J MURRAY	1.00	1,025.00
11/19/19	DISCUSS CASE BACKGROUND AND NEXT STEPS WITH H. AHN; STRATEGIZE REGARDING CORRESPONDENCE TRACKING	R MICHAELSON	0.30	163.50
11/20/19	CONFERENCE WITH R. MICHAELSON REGARDING STATUS	J CARTER	0.20	147.00
11/20/19	REGISTER WITH COURT FOR PURPOSE OF FILING PRO HAC VICE MOTION (.3); VARIOUS EMAILS WITH TEAM REGARDING ADVERSARY ACTION (.7)	J CARTER	1.00	735.00
11/20/19	REVIEW AND ANALYZE NOTICE OF CLAIM TO SWISS RE; UPDATE SPREADSHEET REGARDING SAME; OFFICE CONFERENCE WITH R. MICHAELSON REGARDING SAME	J HOFFMAN	0.20	71.00
11/20/19	REVIEW AND FORWARD PRIOR BRIEFING REGARDING STAY AND RELATED ISSUES TO S. DONATO	J MURRAY	1.30	1,332.50

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
11/20/19	CONFER WITH INTERNAL TEAM SEVERAL TIMES REGARDING POINTS OF CONSIDERATION FOR HEARING PREPARATION REGARDING CNA'S MOTION TO LIFT STAY	J ZOLA	1.00	815.00
11/20/19	MEETING WITH J. CARTER REGARDING CASE STATUS AND NEXT STEPS; DISCUSSIONS WITH H. AHN REGARDING CASE STATUS AND CORRESPONDENCE; DISCUSSIONS WITH J. ZOLA AND J. CARTER REGARDING STRONGHOLD; RESEARCH STRONGHOLD STATUS AND CLAIMS PROCESS	R MICHAELSON	2.80	1,526.00
11/21/19	MEETING WITH S. DONATO REGARDING HEARING STRATEGY. (1.0); HEARING REGARDING MOTIONS TO LIFT STAY (1.9); REVIEW CASES AND PRIOR RULINGS REGARDING STAY ISSUES, INCLUDING JURY TRIAL ISSUES (2.0)	J MURRAY	4.90	5,022.50
11/22/19	TELECONFERENCE WITH S. DONATO REGARDING CNA ISSUES (0.6); REVIEW CNA REQUESTS AND FOLLOW UP WITH TEAM REGARDING SAME (0.9)	J MURRAY	1.50	1,537.50
11/25/19	TELECONFERENCE REGARDING CASE STATUS AND PREPARE FOR SAME	J CARTER	2.30	1,690.50
11/25/19	REVIEW AND ANALYZE CNA RESPONSE REGARDING ALL PENDING CLAIMS; FORWARD SAME TO J. CARTER	J HOFFMAN	0.40	142.00
11/25/19	TELECONFERENCE WITH S. DONATO AND TEAM REGARDING INSURANCE ADVERSARY PROCEEDING AND MEETINGS WITH CNA (0.9); REVIEW RECENT CARRIER COVERAGE POSITIONS AND CORRESPONDENCE (0.9)	J MURRAY	1.80	1,845.00
11/26/19	TELECONFERENCE REGARDING CNA AND UPCOMING CONFERENCE	J CARTER	0.50	367.50
11/26/19	REVIEW AND ANALYZE ADDITIONAL COMPLAINTS	J HOFFMAN	0.20	71.00
11/26/19	TELECONFERENCE WITH S. DONATO AND DEFENSE TEAM REGARDING CNA MEETING (0.5); TELECONFERENCE WITH C. JONES (INTERSTATE) REGARDING ADVERSARY PROCEEDING (0.5)	J MURRAY	1.00	1,025.00
11/26/19	REVIEW LONDON POLICIES FOR SERVICE OF SUIT CLAUSES	R MICHAELSON	0.30	163.50
TOTAL SERVICES				\$ 138,444.50
LESS 23% ACCOMMODATION				<u>(31,842.24)</u>
NET SERVICES				\$ 106,602.26

PENNSYLVANIA NEW YORK NEW JERSEY DELAWARE WASHINGTON, DC FLORIDA CALIFORNIA OHIO TEXAS ILLINOIS SHANGHAI

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FOR DISBURSEMENTS ADVANCED THROUGH NOVEMBER 30, 2019

DATE	DESCRIPTION	AMOUNT
10/22/2019	AIRFARE: JAMES MURRAY MEETING WITH LMI COUNSEL REGARDING CLAIMS AND STATUS ON 10/22/19 (DC/BUFFALO/NY/MINNEAPOLIS/DC)	338.52
10/22/2019	TAXI: JAMES MURRAY MEETING WITH LMI ON 10/22/19 (AIRPORT TO MEETING)	45.50
10/22/2019	TAXI: JAMES MURRAY MEETING WITH LMI COUNSEL REGARDING CLAIMS AND STATUS ON 10/22/19 (HOME TO AIRPORT)	58.08
11/04/2019	LEXISTHOMAS, JANE/ACCESS CHARGE	142.56
11/04/2019	LEXISTHOMAS, JANE/DOC ACCESS	76.32
11/06/2019	LEXISTHOMAS, JANE/DOC ACCESS	38.16
11/06/2019	LEXISTHOMAS, JANE/ACCESS CHARGE	237.60
11/06/2019	LEXISTHOMAS, JANE/DOC ACCESS	38.16
11/13/2019	MISCELLANEOUS COURT COST: JAMES CARTER STATE BAR OF TEXAS CERTIFICATE OF GOOD STANDING IN CONNECTION WITH PRO HAC VICE ADMISSION TO THE UNITED STATES BANKRUPTCY COURT, WESTERN DISTRICT OF NEW YORK. ON 11/13/19	25.00
11/13/2019	MISCELLANEOUS COURT COST: JAMES CARTER DC BAR CERTIFICATE OF GOOD STANDING IN CONNECTION WITH PRO HAC VICE ADMISSION TO THE UNITED STATES BANKRUPTCY COURT, WESTERN DISTRICT OF NEW YORK. ON 11/13/19	25.00
11/14/2019	WASHINGTON STATE SUPREME COURT CERTIFICATE OF GOOD STANDING FOR JIM MURRAY	5.00
11/14/2019	CLERK OF THE COURT, SOUTHERN DISTRICT OF NY CERTIFICATE OF GOOD STANDING FOR JIM MURRAY	19.00
11/18/2019	MISCELLANEOUS COURT COST: JAMES MURRAY DC CERTIFICATE OF GOOD STANDING -- PAPER COPY. ON 11/18/19	25.00
11/18/2019	MISCELLANEOUS COURT COST: JAMES CARTER E-MAILED DC BAR CERTIFICATE OF GOOD STANDING AT REQUEST OF BANKRUPTCY COUNSEL IN ORDER TO IMMEDIATELY FILE PRO HAC VICE ADMISSION APPLICATION (PRIOR TO RECEIPT OF ALREADY-ORDERED HARD COPY) IN CONNECTION WITH PRO HAC VICE ADMISSION TO THE UNITED STATES BANKRUPTCY COURT, WESTERN DISTRICT OF NEW YORK. ON 11/18/19	25.00

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DATE	DESCRIPTION	AMOUNT	
11/18/2019	MISCELLANEOUS COURT COST: JAMES MURRAY DC CERTIFICATE OF GOOD STANDING -- ELECTRONIC VERSION FOR QUICK FILING. ON 11/18/19	25.00	
11/20/2019	AIRFARE: JAMES MURRAY ATTEND HEARING ON 11/20/19 (ALBUQUERQUE TO ROCHESTER)	544.60	
11/20/2019	OUT OF TOWN LODGING: JAMES MURRAY ATTEND HEARING ON 11/20/19	269.22	
11/21/2019	AIRFARE: JAMES MURRAY ATTEND HEARING ON 11/21/19 (ROCHESTER TO DC)	269.70	
11/21/2019	TAXI: JAMES MURRAY ATTEND HEARING ON 11/21/19 (HOTEL TO COURTHOUSE)	17.52	
11/21/2019	TAXI: JAMES MURRAY ATTEND HEARING ON 11/21/19 (AIRPORT TO HOME)	107.78	
11/25/2019	CLERK, COURT OF APPEALS FOR CERTIFICATE OF GOOD STANDING FOR OMID SAFA	7.00	
	DOCKET SEARCHES	12.40	
	REPRODUCTION OF DOCUMENTS	1,242.75	
	UNITED PARCEL SERVICE	9.30	
TOTAL DISBURSEMENTS		\$ 3,604.17	
CURRENT INVOICE TOTAL		\$ 110,206.43	
TIME AND FEE SUMMARY			
TIMEKEEPER	RATE	HOURS	FEES
HANNAH K. AHN	545.00	0.20	109.00
JAMES CARTER	735.00	47.90	35,206.50
JAMES MURRAY	1,025.00	53.90	55,247.50
JANE THOMAS	390.00	57.00	22,230.00
JARED ZOLA	815.00	4.70	3,830.50
JEFFREY A. HOFFMAN	355.00	36.10	12,815.50
ROBYN MICHAELSON	545.00	8.30	4,523.50
SANDY NANG	270.00	16.60	4,482.00
TOTALS	224.70		\$ 138,444.50